

**FILED**

**FEB 15 2018**

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

UNITED STATES DISTRICT COURT

for the

Southern District of Illinois

Kent Stubbs  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Plaintiff/Petitioner(s)  
v.  
HCUA, Cunningham  
Doctor, Shah  
Doctor, Ahmed  
Jane Doe, Nurse, 3-house  
Defendant/Respondent(s)

Case Number: 18-408-SMY

(Clerk's Office will provide)

☐ CIVIL RIGHTS COMPLAINT

pursuant to 42 U.S.C. §1983 (State Prisoner)

☐ CIVIL RIGHTS COMPLAINT

pursuant to 28 U.S.C. §1331 (Federal Prisoner)

☐ CIVIL COMPLAINT

pursuant to the Federal Tort Claims Act,  
28 U.S.C. §§1346, 2671-2680, or other law

I. JURISDICTION

Plaintiff:

A. Plaintiff's mailing address, register number, and present place of confinement.

Defendant #1:

B. Defendant \_\_\_\_\_ is employed as  
(a) (Name of First Defendant)

(b) \_\_\_\_\_  
(Position/Title)

with \_\_\_\_\_  
(c) (Employer's Name and Address)

At the time the claim(s) alleged this complaint arose, was Defendant #1 employed by the state, local, or federal government? ☐ Yes ☐ No

If your answer is YES, briefly explain:

# UNITED STATES DISTRICT COURT

for the

Southern District of Illinois

Jane Doe, Physical Therapist  
Jane Doe, Physical Therapist (Asst)  
Warden, Nicholas Lamb  
John Doe, Officer, 3-house, A-wing  
John Doe, Lieutenant, 3-house  
Officer Bowker, 8-house, C-wing  
Officer Johnson, 8-house, C-wing  
Wexford, CEO, Stanley Eugene  
Med. Dir., Dr. Louis Shicker  
Director, John Baldwin

Defendant/Respondent(s)

\* (In their individual and official capacity)

Case Number: \_\_\_\_\_  
(Clerk's Office will provide)

☐ CIVIL RIGHTS COMPLAINT  
pursuant to 42 U.S.C. §1983 (State Prisoner)  
☐ CIVIL RIGHTS COMPLAINT  
pursuant to 28 U.S.C. §1331 (Federal Prisoner)  
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pursuant to the Federal Tort Claims Act,  
28 U.S.C. §§1346, 2671-2680, or other law

## I. JURISDICTION

### Plaintiff:

A. Plaintiff's mailing address, register number, and present place of confinement.

Kent Stubbs  
Lawrence Correction Center  
10930 Lawrence Rd.  
Sumner, IL. 62466

### Defendant #1:

B. Defendant HCUA, Cunningham is employed as  
(a) (Name of First Defendant)

Administrator in charge of Healthcare  
(b) (Position/Title)

with Lawrence Correction Center  
(c) (Employer's Name and Address)

10940 Lawrence Rd., Sumner IL. 62466

At the time the claim(s) alleged this complaint arose, was Defendant #1 employed by the state, local, or federal government? ☒ Yes ☐ No

If your answer is YES, briefly explain: working for Illinois State Prison as health care unit administrator in charge of all medical related issues.

Defendant #2:

C. Defendant Doctor, Shah is employed as

(Name of Second Defendant)

Medical Doctor

(Position/Title)

with Lawrence Correction Center

(Employer's Name and Address)

10940 Lawrence Rd., Summer IL. 62466

At the time the claim(s) alleged in this complaint arose, was Defendant #2 employed by the state, local, or federal government? ☒ Yes ☐ No

If you answer is YES, briefly explain: working for Illinois State Prison as a Doctor, responsible for providing care to patients in (HCU).

Defendant #3:

Additional Defendant(s) (if any):

D. Using the outline set forth above, identify any additional Defendant(s).

Defendant. Doctor, Ahmed employed as

Head medical Doctor

with Lawrence Correction Center

10940 Lawrence Rd., Summer IL. 62466

At the time the claim(s) alleged in this complaint arose, was Defendant #3 employed by the state, local, or federal government? ☒ Yes ☐ No

If yes, Briefly explain: working for Illinois State Prison as a doctor, responsible for providing care to patients in (HCU).

Defendant #4:

Defendant Jane Doe, Nurse, 3-house Employed as

Med-Line Nurse in 3-house

with Lawrence Correction Center

10940 Lawrence Rd., Sumner, IL. 62466

At the time the claim(s) alleged in this complaint arose, was Defendant #4 employed by the state, local, or federal government? ☒ yes ☐ No

If yes, Briefly Explain: work for Illinois State Prison as a nurse, responsible for providing care to inmate patients.

Defendant #5:

Defendant Jane Doe, Physical Therapist employed as

Physical Therapist in charge

with Lawrence Correction Center

10940 Lawrence Rd., Sumner, IL. 62466

At the time the claim(s) alleged in this complaint arose, was Defendant #5 employed by the state, local, or federal government? ☒ yes ☐ No

If yes, Briefly Explain: work for Illinois State Prison as Therapist, responsible for providing care to inmates.  
2(B)

Defendant #6:

Defendant Jane Doe, Physical Therapist employed as

Physical Therapist Assistant

with Lawrence <sup>Correction</sup> ~~Medical~~ Center

10940 Lawrence Rd. Sumner, IL. 62466

At the time this claim(s) alleged in this complaint arose, was Defendant #6 employed by the State, local, or Federal government? ☒ yes ☐ No

If yes, Briefly Explain: working at Illinois State Prison as a Therapist, responsible for providing care to inmate patients.

Defendant #7:

Defendant Warden, Nicholas Lamb employed as

Warden in Charge of Operations

with Lawrence Correction Center

10940 Lawrence Rd. Sumner IL. 62466

At the time this claim alleged in this complaint arose, was Defendant #7 employed by the State, Local, or Federal government? ☒ yes ☐ No

If yes, Briefly Explain: working for Illinois State Prison as head warden, responsible for over seeing entire prison operations 2(c)

Defendant #8:

Defendant John Doe, officer, (3-House C-wing) employed as

3-house officer in charge of C-wing.

with Lawrence Correction Center

10940 Lawrence Rd., Sumner IL. 62466

At the time the claim(s) alleged in this complaint arose, was defendant #8 employed by The State, local, or Federal government? ☒ yes ☐ No

If yes, Briefly Explain: work for Illinois State Prison as an officer.

Defendant #9:

Defendant John Doe, Lieutenant (3-house) employed as

Lieutenant in charge of 3-house

with Lawrence Correction Center

10940 Lawrence Rd., Sumner IL. 62466

At the time the claim(s) alleged in this complaint arose, was Defendant #9 employed by The State, local, or Federal government? ☒ yes ☐ No

If yes, Briefly Explain: work for Illinois State Prison as a Lieutenant, responsible for Prison Security and Safety.

Defendant #10:

Defendant officer Bowker (8-house  
C-wing) employed as

8-house officer in charge of C-wing

with Lawrence Correctional Center

10940 Lawrence Rd., Summer IL. 62466

At the time the claim(s) alleged in this complaint arose, was Defendant #10 employed by the state, local, or federal government? ☒ yes ☐ No

If yes, Briefly Explain: work for Illinois State Prison as a Correctional officer.

Defendant #11:

Defendant officer Johnson (8-house  
C-wing) employed as

8-house officer in charge of C-wing

with Lawrence Correction Center

10940 Lawrence Rd., Summer IL. 62466

At the time the claim(s) alleged this complaint arose, was Defendant #11 employed by the state, local, or federal government? ☒ yes ☐ No

If yes, Briefly Explain: work for Illinois State Prison as a Correctional officer.

Defendant #12:

Defendant CEO, Stanley Eugene employed as

CEO, Wexford Medical

with Wexford Health Incorporated

105 Holiday Drive, Foster Plaza Park, Pittsburgh,  
PA. 15220

At the time the claim(s) alleged in this complaint arose, was Defendant #12 employed by the state, local, or Federal government? ☒ Yes ☐ No

If yes, Briefly Explain: CEO of Wexford, employed by the state, to provide medical care to Illinois State prisoners.

Defendant #13:

Defendant Med. Dir, Dr. Louis Shicker employed as

IDoc Medical Director

with Illinois Dept. of Corrections Medical

James R. Thompson Center, 100 W. Randolph, ST.  
Suite 4-200, Chicago IL. 60601

At the time the claim(s) alleged this complaint arose, was Defendant #13 employed by the state, local, or Federal government? ☒ Yes ☐ No

If yes, Briefly Explain: Medical Director of Illinois State Prisons responsible for overseeing medical services at all Illinois State Prisons.



Defendant #14:

Defendant Director, John Baldwin, employed as

Director of Illinois Dept of Corrections

with Illinois Department of Corrections

1301 Concordia Court, P.O. Box 19277,  
Springfield IL. 62794-9277

At the time the claim(s) alleged in this complaint arose,  
was defendant #14 employed by the State, local or  
Federal government? ☒ Yes ☐ No

If yes, Briefly Explain: Director of Illinois State  
Prisons, responsible for prison operations in the  
State of Illinois.

## II. PREVIOUS LAWSUITS

- A. Have you begun any other lawsuits in state or federal court relating to your imprisonment? ☒ Yes ☐ No
- B. If your answer to "A" is YES, describe each lawsuit in the space below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper using the same outline. Failure to comply with this provision may result in summary denial of your complaint.

1. Parties to previous lawsuits:

Plaintiff(s): Kent Stubbs

Defendant(s): Tom Dart et al.,

2. Court (if federal court, name of the district; if state court, name of the county): Northern District of Illinois
3. Docket number: 14 C 5271
4. Name of Judge to whom case was assigned: Manish S. Shah
5. Type of case (for example: Was it a habeas corpus or civil rights action?): Civil Rights violation for living conditions.
6. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Settlement Reached
7. Approximate date of filing lawsuit: July 16, 2014
8. Approximate date of disposition: Sept. 15, 2017

## II. PREVIOUS LAWSUITS

- A. Have you begun any other lawsuits in state or federal court relating to your imprisonment? ☒ Yes ☐ No
- B. If your answer to "A" is YES, describe each lawsuit in the space below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper using the same outline. Failure to comply with this provision may result in summary denial of your complaint.

1. Parties to previous lawsuits: Kent Stubbs  
Plaintiff(s):

Defendant(s): Nicholas Lamb et al.,

2. Court (if federal court, name of the district; if state court, name of the county): Southern District of Illinois
3. Docket number: 17-838-SMY
4. Name of Judge to whom case was assigned: STac: M. Yandle
5. Type of case (for example: Was it a habeas corpus or civil rights action?): Civil Rights Actions
6. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Still pending
7. Approximate date of filing lawsuit: August 7, 2017
8. Approximate date of disposition: 2/7/18

### III. GRIEVANCE PROCEDURE

- A. Is there a prisoner grievance procedure in the institution? ☒ Yes ☐ No
- B. Did you present the facts relating to your complaint in the prisoner grievance procedure? ☒ Yes ☐ No
- C. If your answer is YES,
1. What steps did you take? Exhausted The grievance Process in multiple grievances over a period of several months
  2. What was the result? Most issues raised in my grievances went unresolved by The grievance process.
- D. If your answer is NO, explain why not. N/A —
- E. If there is no prisoner grievance procedure in the institution, did you complain to prison authorities? ☐ Yes ☐ No
- F. If your answer is YES,
1. What steps did you take?
  2. What was the result?
- G. If your answer is NO, explain why not.
- H. Attach copies of your request for an administrative remedy and any response you received. If you cannot do so, explain why not:

## IV. STATEMENT OF CLAIM

- A. State here, as briefly as possible, when, where, how, and by whom you feel your constitutional rights were violated. Do not include legal arguments or citations. If you wish to present legal arguments or citations, file a separate memorandum of law. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. If your claims relate to prison disciplinary proceedings, attach copies of the disciplinary charges and any disciplinary hearing summary as exhibits. You should also attach any relevant, supporting documentation.

On Monday, April 10, 2017, I was awakened by the unit officer for med-line and was attempting to climb down off the top bunk when I missed the railing with my foot and lost my balance. I fell down backwards several feet, hitting my head and back, on the concrete floor severely injuring myself. (B-House, A-wing).

The unit officer notified the Lieutenant on duty and the nurse who was passing out meds. The nurse came over to help as I layed there in pain and couldn't breathe. I felt something in my back pop. I had a large knot on the back of my head and a swollen left wrist and pinky finger. (See Exhibit - 1).

The nurse examined my injuries and asked me how did I fall, and I told her I could not find the bed rail with my foot and I lost my balance. The nurse then stated to the Lieutenant, "They really should have ladders on the beds, I've seen more and more inmates fall and hurt themselves." (See Exhibit - 1)

Because of the fall, I was unable to get up, and could barely move. I layed there several minutes waiting for a stretcher to come. After a long wait, I was told by the Lieutenant there was no one available to bring the stretcher. So instead, I was lifted off the floor by the unit officer, nurse, and Lieutenant, and placed into a wheel chair, which caused me to endure further pain and ~~injury~~ injury to my lower back.

I was wheeled over to medical by the unit officer, and X-rayed by one of the nurses on duty.

Later that day, the X-rays of my head, back, and hand were examined by Dr. Shah, who concluded there were no broken bones. Dr. Shah then indicated I would be released and sent back to my cell, to which I then informed Dr. Shah that I felt something pop in my back and I was in severe pain and could not ~~get~~ get up or move on my own without help. I couldn't even get in and out the wheelchair without help from the nurse or the inmates working in medical.

Dr. Shah then stated he would provide me a wheel chair and a low bunk, Low gallery permit, and medication to help with the pain. I was kept in Health care overnight.

The next morning, April 11, 2017, I was helped into a wheel chair by one of the inmate workers in medical, and provided a urine-cup to pee in, and wheeled over to (B-house, unit-C), and placed into an 'ADA' (handicap) cell all by myself.

That same night, early morning Wednesday, April 12, 2017, I was stuck in bed, unable to get up or move for nearly (14-hours) after I further injured my back trying to get up in the middle of the night for a drink of water. In which I further irritated my injury and became incapacitated and unable to move and ended up urinating on myself three times as I layed there several hours waiting for help. (See Exhibit-2)

I couldn't get up or move, or reach the Emergency call Button on the wall on the other side of the room. I could only lay there waiting for the officer to come pass on his rounds. I layed there for what seemed like hours and no one came and I eventually fell back to sleep. When I woke up the pain was even worse.

I missed breakfast and Lunch, and it wasn't until around 12 pm, one of the officers on duty finally came to my cell. officer 'Bowker', The unit officer began opening the cell doors to let inmates out of their cells for day room to shower and use the telephone. When officer Bowker opened my cell door I immediately told officer Bowker I needed help. I told officer Bowker I had injured my back and needed medical attention. Instead of calling for help, officer Bowker told me to write a request slip and send it to medical. I told officer Bowker it was an emergency. I could not get up out of the bed. I needed help. I also explained that I could not even get up to go to lunch or to eat my breakfast, because I was in pain. Officer Bowker ignored my request for help and responded by again telling me to put in a request slip for sick call. Officer Bowker then closed the cell door and left me laying there. He did not come back to my cell to check on me at all for the rest of his shift, even though I told him I needed help and could not get up. And because of officer Bowker's deliberate neglect ~~and~~ towards my emergency medical need, I was forced to lay there until the next shift arrived. I was weak, nauseated, and dehydrated. I layed there for nearly 14-hours with nothing to eat or drink, and could not ~~get~~ get up to use the bathroom, so ~~after~~ I filled my urine cup I tried holding my urine until I couldn't hold it anymore and I ended up urinating on myself (3) times.

When the next shift officer arrived, I was able to get his attention and he called for help, and I was taken on a stretcher to Healthcare and transported to an outside hospital where I recieved further medical examination.

Several hours later I was returned to the prison and taken

back to my cell again by myself with no 'ADA-Attendant' to assist me, and over the next few weeks I continued to experience severe pain in my lower back, (see EXHIBITS: 3A-3D). I was only given a 200 mg. IBuprofen which did nothing to help with the pain. A few weeks later on April 26, 2017, I was prescribed a different pain medication by Dr. Shah that also did little to help with the pain. (see EXHIBITS: 4A-4B).

On April 30, 2017, I re-injured my back again as I was getting out of bed and spent the next few weeks in excruciating pain and was denied emergency medical attention by officer ~~an~~ Johnson and the medical staff. (see EXHIBIT: 5).

On May 7, 2017, I began filing grievances against officer Johnson and the medical staff and the prison administration for the unsafe bunk beds and poor medical treatment I've received as a result of my injury. I was harassed and retaliated against by officer Johnson and began to fear for my health and safety. I filed emergency grievances ~~about~~ requesting to be moved to a different housing unit, away from officer Johnson, but my emergency grievances were ignored by the administration. (see EXHIBITS: 6A-6B).

I lived in fear and refused to come out my cell most days. It wasn't until after I wrote to Mrs. Weaver in the Placement office and told her about my fears and concerns that I was then moved to a different housing unit, away from officer Johnson. (see EXHIBIT: 7).

On May 26, 2017, my prescription for pain medication expired, and I was not provided any refill or any other medication to help with ~~from~~ my back pain. And I was no longer being seen by Dr. Shah. I was told that Dr. Shah retired and was no longer working, and I was seen by a new doctor, Dr. Ahmed.



The first time I met with Dr. Ahmed was May 24, 2017, two days before my pain medication expired. Dr. Ahmed did not examine me or make any attempt to determine the severity of my back injury at all. I only met with Dr. Ahmed in his office for about five minutes, and two days later, my medication expired, and I was refused any further treatment. ~~treatment~~. I submitted multiple request to see the doctor and was instead seen by nurses who kept telling me there was nothing they could do to help with my back pain. For months I was cut off and denied any medical treatment for my chronic back pain. Despite my dozens of medical request and please for emergency medical treatment, I was deliberately denied any medical treatment or medication. (see Exhibits: 8A-8K).

I was also denied 'ADA-assistance' despite my severe back injury and multiple written request. (see Exhibits: 9A-9E).

I made (HCUA) Cunningham, head of medical, aware of my needs and the neglect that I had suffered in a letter that I sent to her. (see Exhibits: 10). I also sent a letter to the warden, Nicholas Lamb, making him aware of the abuse and neglect I was experiencing. (see Exhibits: 11). And I filed a grievance against Dr. Ahmed for deliberately denying me proper medical treatment and causing me to suffer needlessly in pain, and for not providing me an ADA assistant. (see Exhibits: 12). But none of the staff or administration made any effort to address any of my issues.

As a result of the administration's neglect and failure to immediately address my medical needs I was made to suffer in severe pain for months. Several times within a four month period I was denied emergency medical attention,

and when I was seen by Dr. Ahmed or one of The nurses, my medical need were either ignored or nothing was done to resolve or address any of my medical problems. Medical staff continued to deny me treatment for my pain and the ADA assistance that I needed. I even made multiple request for Physical Therapy. And after months of Asking, I was finally provided Physical Therapy on or about June 20, 2017, in which I attended Therapy twice a week, for nearly two months. I was usually seen by one Therapist. Then on or about August 18, 2017, I was seen by two Therapist. (my regular Therapist, and a younger Therapist who seem to be assisting her.) — my regular Therapist sat watching as the younger Therapist asked me multiple questions about my health and level of pain. The younger Therapist became angry or irritated by my answers, and began to treat me very ~~hostile~~ hostile and rude. She ordered me to climb onto the exercise mat, then told me to try and stand. I told her I could not stand without holding on to something. I told her I could not place my full body weight on my legs without experiencing unbearable pain in my lower back. She then told me to hold on to the back of my wheel chair and pull myself up as she held the front of the wheel chair. And as I stood holding my weight mostly on my arms, the Therapist let go of the wheelchair causing me to apply excessive weight to my lower back and I fell onto the exercise mat in extremely agonizing pain. (see Exhibit:13). The nurse showed no care or concern for my injury, and told me she would be recommending my Therapy sessions be terminated because I was not showing any progress. - After the incident, I was not called back to any more Therapy. I saw the doctor multiple times after the

incident and he kept asking me how was my Therapy going, and I kept telling him that I haven't been called back over. In the months following the incident I made multiple request to be sent to see a Specialist with experience in treating patients with Severe back injuries and/or nerve damage, but my request for outside treatment has been ignored.

On August 25, 2017, I wrote a grievance against (HCUA) Cunningham, for failing to properly address any of my medical needs. (See Exhibit: 14), and on October 18, 2017, I wrote a grievance against the warden for his part in ignoring and failing to address the serious and blatant neglect by medical staff as well as other prison officials for failing to respond properly to my medical needs. (See Exhibits: 15A-15B), I continued to file medical request to Mrs. Cunningham, and request to the warden, and only recently around about October 27, 2017, did the administration began to address these issues, after I filed grievances against the Head of medical, (HCUA) Cunningham, warden Lamb, and Dr. Ahmad.

As a result of the injury I sustained in my fall from the top bunk, I am currently still in a wheel chair, unable to perform the most basic daily functions and need assistance getting to and from the chow hall and call passes on a daily basis.

only recently after filing grievances against (HCUA) Cunningham, warden Lamb, and Dr. Ahmed, did I began to receive medication for my pain, an 'ADA' attendant, and permission to attend 'ADA' gym. I have also made medical staff aware that the medication I'm currently receiving does very little to alleviate the pain. (This is the same medication I was receiving before, that I told the doctor it did not work to relieve the pain.) - (See Exhibits: 16A-16I).

After receiving my medical permit for ADA-gym, and an ADA attendant, I have repeatedly been denied permission to attend ADA-gym, despite my medical permit provided by Dr. Ahmed, granting me medical authorization, and I've repeatedly been without a pusher, and have had ~~rather~~ to either skip chow or risk causing injury to my back by pushing myself. And despite my many attempts to show the officer's working C-wing my medical permit granting me permission to attend ADA-gym, I was repeatedly told I was not on their list and therefore I could not attend ADA-gym.

I wrote a request to ~~the~~ medical to make them aware that I needed to be added to the officer's movement sheet so that <sup>(Dont)</sup> ~~I~~ <sup>I</sup> continue being denied permission to attend ADA-gym. Days later, around 10/31/17, I was seen by a nurse who provided me an updated medical permit for ADA-gym, and she gave a copy to the officer's working on the wing in the Bubble to place into the officer's log book as proof of my medical authorization to attend ADA-gym. The nurse also told me that if anyone gives me a hard time, have them call over to medical.

Shortly after receiving my second permit, I was placed on C-grade and was denied permission to attend ADA gym as a form of disciplinary punishment. I then explained to the ~~officer~~ officer's on duty, officer Welsh, that my attending ADA gym is ~~was~~ a part of my medical recovery treatment to rehabilitate myself. But I was still not allowed to go. For three-months I was denied my medical authorization to attend ADA gym. - on 1/9/18, my C-grade restriction ended, and on 1/19/18, I again tried to attend ADA gym and was told by a different officer (officer Zea), that I was not on the ~~officer~~ officer's movement sheet and therefore I would not be allowed to attend ADA gym. I asked to speak with a Lieutenant, and I showed Lieutenant Gilbert my medical permit. I was then

told by Lieutenant Gilbert also that I would not be allowed to attend ADA-gym because I was not on Their list. I asked both the officer and Lieutenant to call over to medical to confirm my Authorization, but They both refused.

Around noon, All ADA inmates on my wing were allowed to attend ADA gym, but I was left in my cell and not allowed to go, despite my medical permit issued by Dr. Ahmed.

I again asked to speak with the Lieutenant, and a few hours later, Lieutenant Gilbert came to my cell and told me he had informed warden Brookhart of my situation and was leaving it to her to resolve the matter, and he left.

I believe that if the prison would have had ladders on the bunkbeds to allow inmates to climb up and down off the bunkbed safely, I would not have ~~injured~~ been injured, and I would not be going through any of this pain and discomfort. I also believe that as a result of the medical administrations refusal to provide adequate medical treatment, and access to a specialist with experience in treating patients with severe back injuries, my recovery progress has been greatly hindered and diminished (see Exhibits: 17A-17C),

on 1/15/18, I was called to medical after submitting a request to see the Doctor about my continuing back pain, and pain in my legs and joints, and the soreness in my butt from constantly sitting. I asked months ago for a seat cushion, and on my visit I again requested a seat cushion and a back brace, as well as my need to see ~~see~~ a back specialist. On my visit, I was seen by Dr. Shah, the Doctor I was told no longer worked for the prison. This was my original Doctor who I first saw after my accident, and wrote my grievance against. I told Dr. Shah how I had been refused access to see a back specialist by the new Doctor, Dr. Ahmed, and how Dr. Ahmed had taken me off the

Pain medication that he (Dr. Shah) had originally prescribed, and I was placed on a less effective medication that did nothing to alleviate my pain. - Dr. Shah said he could not interfere with the medical decisions made by Dr. Ahmed, Dr. Shah also denied my request for a back brace to help alleviate my back pain, and he said nothing at all to me about if he would or would not issue me a Seat Cushion for my wheel chair to alleviate the soreness from constantly sitting. I filed a grievance on (1-20-18), grievance still exhausting.

Because of the injury I sustained, and the countless suffering and deliberate indifference and negligence of the Administration and medical staff, I have decided to bring forth this claim against Lawrence Correctional Center's Prison Administration, as well as the Director of IDOC, John Baldwin, medical Director, Dr. Louis Schicker, and CEO of Wexford, Stanley Eugene.

## V. REQUEST FOR RELIEF

State exactly what you want this court to do for you. If you are a state or federal prisoner and seek relief which affects the fact or duration of your imprisonment (for example: illegal detention, restoration of good time, expungement of records, or parole), you must file your claim on a habeas corpus form, pursuant to 28 U.S.C. §§ 2241, 2254, or 2255. Copies of these forms are available from the clerk's office.

Provide an order declaring Defendants violated the United States Constitution, an injunction ordering all inmates be removed from The Top Bunks until ladders and other safety features are provided to allow inmates to climb in and out The Top Bunk safely. Defendants be responsible for covering all current and future medical expenses that result from my injury. And damages be paid to plaintiff

## VI. JURY DEMAND (check one box below) in The Amount of (\$350,000).

The plaintiff ☒ does ☐ does not request a trial by jury.

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on: 2/7/18  
(date)

Kent Stubbbs  
Signature of Plaintiff

10930 Lawrence Rd.  
Street Address

Kent Stubbbs  
Printed Name

Sumner IL 62466  
City, State, Zip

M51378  
Prisoner Register Number

- None -  
Signature of Attorney (if any)



LEGAL  
MAIL

Sent Stubs #MS1378  
Lawrence Cott, Center  
030 Lawrence Rd  
Quinn, IL 62466



1 of 2  
Envelopes

PRIVILEGED  
COMMUNICATION  
Cleared



Clerk of Court

United States District Court  
Southern District of Illinois

P.O. Box 249

East St. Louis, IL 62201



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FEB 15 2018  
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